

RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
Office and Post Office Address
60 East 42nd Street, Suite 2430
New York, New York 10165
(212) 297-0700

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NANCY DOUGLAS X 05 CV 02447 (VM) (DF)

Plaintiff,

NOTICE OF MOTION

-against-

FIRST UNUM LIFE INSURANCE COMPANY,

Defendant.

--X

PLEASE TAKE NOTICE that, upon the annexed Local Rule 56.1

Statement, affirmation of Scott M. Riemer, dated March 14, 2006, together with exhibits thereto, and upon all prior proceedings herein, plaintiff will move this Court before the Honorable Victor Marrero, at the United States Courthouse, 40 Centre Street, New York, New York 10007, Courtroom 905, as soon as counsel may be heard, for an order granting summary judgment in favor of plaintiff pursuant to Fed. R. Civ. P. Rule 56, and for such other relief as the Court deems just and proper.

Dated: New York, New York
March 14, 2006

RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
60 East 42nd Street, Suite 2430
New York, New York 10165
(212) 297-0700

By: _____ /s/
Scott M. Riener (SR5005)

TO: Brian G. Kanner, Esq.
Begos & Horgan, LLP
327 Riverside Avenue
Westport, CT 06880
203-226-9990